

Last updated: 10 February 2022

## Privacy Notice - EY TP Doc Manager

### 1. Introduction

This Privacy Notice is intended to describe the practices EY follows in relation to the EY TP Doc Manager ("Tool") with respect to the privacy of all individuals whose personal data is processed and stored in the Tool. This Privacy Notice should be read together with the [ey.com Privacy Statement](#), and in case of any conflict with the [ey.com Privacy Statement](#), the terms of this Privacy Notice will prevail. Please read this Privacy Notice carefully.

### 2. Who manages the Tool?

"EY" refers to one or more of the member firms of Ernst & Young Global Limited ("EYG"), each of which is a separate legal entity and can determine the purposes and means for data processing in its own right (i.e. act as a data controller or in a similar capacity). The entity that is acting as data controller (or similar capacity) by providing this Tool on which your personal data will be processed and stored is EY Godkendt Revisionspartnerselskab Dirch Passers Allé 36 2000 Frederiksberg Denmark.

The personal data in the Tool is shared by EY Godkendt Revisionspartnerselskab with one or more member firms of EYG (see "Who can access your personal data" section 6 below).

The Tool is hosted on external servers in an EY Managed MS Azure Data Centre in Amsterdam, the Netherlands.

### 3. Why do we need your personal data?

The Tool is a light-weight transfer pricing documentation tool for tax practitioners (EY Partners and employees from the tax service line) that does 'search and replace' in documents, stores documents in a structured manner and manages workflows.

Your personal data processed in the Tool is used as follows:

The email address is only used for logging in to the Tool and for the user to receive workflow notifications via email, for instance if a specific transfer pricing documentation task is assigned to the user by another user.

The name of the user and the job title is used as part of the workflow notification system, so other users can assign tasks to the user. The name of users is also used to assign the user roles described in section 6.

EY client data uploaded to the Tool, such as the legal entity names of the company, a description of a company's transactions, net revenue, income statements, and a description of the company's history, is only used for generating transfer pricing documentation for that specific EY client.

The Tool is offered as a SaaS as well. When being used as a SaaS, login credentials are used in the same manner and EY client information and documentation is used in the same manner individually by those EY clients exclusively. EY Partners and employees will only have access to this information if EY clients specifically request and grant access to those EY Partners and employees.

EY relies on the following basis to legitimize the processing of your personal data in the Tool:

Processing of your personal data is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. The specific legitimate interest(s) are conducting client engagements.

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you based on the above legitimate interest(s).

#### 4. What type of personal data is processed in the Tool?

The Tool processes these personal data categories:

- Name (first, last)
- Work email address

The following information is collected about EY client companies:

- Entity code
- Entity name
- Entity address
- Country
- Business segment (ex: group, sales, manufacturing, etc.)
- Entity type (ex: holding and administration, sales, manufacturing, etc.)
- Full-time equivalents
- Intercompany transactions
- Transaction names (ex: cash pool, goods, recharge of expenses, etc.)
- Currency
- Description of the business
- Entity history
- Entity strategy
- Main competitors
- Management description
- Tax ID
- Incorporation year
- Key financial data
- List of agreements
- Local management structure
- Restructurings

The following log data is collected in the Tool:

- Date and time a user logged in last
- Name, date, and time of who modified something last

- Cookies to keep a Users' login active for a period of 6 hours.

The Personal Data is sourced from:

- Provided directly by EY Partners, employees or contractors
- Provided directly by clients

## 5. Sensitive personal data

Sensitive personal data reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation.

EY does not intentionally collect any sensitive personal data from you via the Tool. The Tool's intention is not to process such information. As such, please do not enter any unnecessary personal information or any sensitive personal data (including tax file numbers or other government identifiers), client confidential information, audit secrets, state secrets, commercial secrets, or anything that would violate professional secrecy or confidentiality rules or that would be considered abusive/irrelevant.

## 6. Who can access your personal data?

Your personal data is accessed in the Tool by the following persons/teams:

USER GROUP	LOCATION	PURPOSE	ACCESS	AMOUNT
Group name	Identify country	The action that the group performs	Identify whether access is read, update, add	Provide the approx. number of users with access
Administrator	Denmark, Finland, Norway, Sweden and India.	Can edit all documents regardless of status, add new users and change the access rights of other users. The role is EY client-specific.	Add & update	2-5 per EY client.
Support team	Denmark and India	The same as the Administrators in addition to having direct access to the backend of the Tool (which administrators do not have)	Add & update	Approx. 5

USER GROUP	LOCATION	PURPOSE	ACCESS	AMOUNT
HQ user	Denmark, Finland, Norway, Sweden and India.	Can edit all documents, except final/submitted documents. The role is EY client-specific.	Add & update	Approx. up to 30 per EY client
User	Denmark, Finland, Norway, Sweden and India.	Can only edit local files and transaction modules. Only read access to Group-wide transfer pricing documentation (master files). The role is EY client-specific.	Add & update. Some documents only read.	Approx. up to 50 per EY client
Read-only	Denmark, Finland, Norway, Sweden and India.	Can read all documents/records, but not alter them. EY client-specific role.	Read	Approx. up to 20 per EY client
No access*	Denmark, Finland, Norway, Sweden and India.	Blocks the user's access to any data for a specific EY client.	No access	Depends on how many team members are excluded from an EY client project for whatever reason

\*Individual members within each role (HQ users, users, and read-only) can be blocked off specific EY client matters.

The access rights detailed above involves transferring personal data in various jurisdictions (including jurisdictions outside the European Union) in which EY operates (EY office locations are listed at [www.ey.com/ourlocations](http://www.ey.com/ourlocations)). An overview of EY network entities providing services to external clients is accessible [here](#) (See Section 1 (About EY) - "View a list of EY member firms and affiliates"). EY will process your personal data in the Tool in accordance with applicable law and professional regulations in your jurisdiction. Transfers of personal data within the EY network are governed by EY's [Binding Corporate Rules](#).

We transfer or disclose the personal data we collect to third-party service providers (and their subsidiaries and affiliates) who are engaged by us to support our internal ancillary processes. For

example, we engage service providers to provide, run and support our IT infrastructure (such as identity management, hosting, data analysis, back-up, security and cloud storage services) and for the storage and secure disposal of our hard copy files. It is our policy to only use third-party service providers that are bound to maintain appropriate levels of data protection, security and confidentiality, and that comply with any applicable legal requirements for transferring personal data outside the jurisdiction in which it was originally collected.

To the extent that personal data has been rendered anonymous in such a way that you or your device are no longer reasonably identifiable, such information will be treated as non-personal data and the terms of this Privacy Notice will not apply.

For data collected in the European Economic Area (EEA) or which relates to individuals in the EEA, EY requires an appropriate transfer mechanism as necessary to comply with applicable law. The transfer of personal data from the Tool to Microsoft is governed by an agreement between EY and the service provider that includes standard data protection clauses adopted by the European Commission.

## **7. Data retention**

Our policy is to retain personal data only for as long as it is needed for the purposes described in the section "Why do we need your personal data". Retention periods vary in different jurisdictions and are set in accordance with local regulatory and professional retention requirements.

In order to meet our professional and legal requirements, to establish, exercise or defend our legal rights and for archiving and historical purposes, we need to retain information for significant periods of time.

The policies and/or procedures for the retention of personal data in the Tool are:

The data will be retained in accordance with EY Records Retention Global Policy and the relevant Country Retention Schedule (CRS). The Log Data will be retained in accordance with the EY IT Logging Policy.

After the end of the data retention period, your personal data will be deleted.

## **8. Cookies**

The Tool uses session cookies during a web session.

A "cookie" is technology that allows the Tool to store tokens of information (an 'identifier') on your device while you are using the Tool. Cookies are used in the Tool to provide assurance that access is limited to only authorized users of the Tool and to log you out after a certain time for security purposes.

How do I disable cookies?

By using the Tool, you agree that we can place cookies in your browser. Our cookies are session cookies which means that our cookies are temporary and when you close your browser your cookies are removed. If you do not want to receive a cookie from the Tool, you have the option of setting your browser to notify you when you receive a cookie, so that you may determine whether to accept it or not. However, if you do turn off 'cookies' in your browser, you will not be able to fully experience some of the features of the Tool and you may also be denied access to the Tool or limit security measures.

## 9. Security

EY protects the confidentiality and security of information it obtains in the course of its business. Access to such information is limited, and policies and procedures are in place that are designed to safeguard the information from loss, misuse and improper disclosure. Additional information regarding our approach to data protection and information security is available in our [Protecting your data](#) brochure.

## 10. Controlling your personal data

EY will not transfer your personal data to third parties (other than any external parties referred to in section 6 above) unless we have your permission or are required by law to do so.

You are legally entitled to request details of EY's personal data about you.

To confirm whether your personal data is processed in the Tool or to access your personal data in the Tool or (where applicable) to withdraw your consent, contact your usual EY representative or email your request to [global.data.protection@ey.com](mailto:global.data.protection@ey.com).

## 11. Object, rectification, erasure, restriction of processing or data portability

You can confirm your personal data is accurate and current. You can object to the processing of your personal data or request rectification, erasure, restriction of processing or a readily portable copy of your personal data by contacting your usual EY representative or by sending an e-mail to [global.data.protection@ey.com](mailto:global.data.protection@ey.com).

## 12. Complaints

If you are concerned about an alleged breach of privacy law or any other regulation, contact EY's Global Privacy Leader, Office of the General Counsel, 6 More London Place, London, SE1 2DA, United Kingdom or via email at [global.data.protection@ey.com](mailto:global.data.protection@ey.com) or via your usual EY representative. An EY Privacy Leader will investigate your complaint and provide information about how it will be handled and resolved.

If you are not satisfied with how EY resolved your complaint, you have the right to complain to your country's data protection authority. You can also refer the matter to a court of competent jurisdiction.

Certain EY member firms in countries outside the European Union (EU) have appointed a representative in the EU to act on their behalf if, and when, they undertake data processing activities to which the EU General Data Protection Regulation (GDPR) applies. Further information and the contact details of these representatives are available [here](#).

## 13. Contact us

If you have additional questions or concerns, contact your usual EY representative or email [global.data.protection@ey.com](mailto:global.data.protection@ey.com).